The examiner provides no reason why, absent the instant disclosure, one of ordinary skill in the art would be <u>motivated</u> to change the shape of the coil hooks of Hancock or the German patent and we can conceive of no reason.

Ex parte Gerlach and Woerner, 212 USPQ 471 (PTO Bd. App. 1980) (emphasis in original).

For these reasons, among others, the combination of Loiselle with Hyde and/or Beyea cannot suggest the combination of features in applicant's Claims 1-5, 9-15, 19, 20, particularly as the same are now amended, and it is therefore submitted that the rejection against these claims should be withdrawn and Claims 1-5, 9-15, 19, 20 allowed.

## Paragraph 2 of the Official Action

The Official Action stated that Claims 8, 9, 11-20 are allowable if rewritten in independent form. The Applicant has amended independent Claim 1 to include the limitations of as-filed Claims 6, 7, 8. The Applicant has also added independent Claim 21 which includes the limitations of as-filed Claims 1, 11. Claims 1-5, 9-15, 19-26 are respectfully submitted to be in condition for allowance.

## E. CONCLUSION

In light of the foregoing amendments and remarks, early reconsideration and allowance of this application are most courteously solicited. Should the Examiner consider necessary or desirable any formal changes anywhere in the specification, claims and/or drawing, then it is respectfully asked that such changes be made by Examiner's Amendment, if the Examiner feels this would facilitate passage of the case to issuance. Alternatively should the Examiner feel that a personal discussion might be helpful in advancing this case to allowance, they are invited to telephone the undersigned.

Respectfully submitted,

Michael S. Neustel (Reg. No. 41,221)

NEUSTEL LAW OFFICES, Ltd.

2534 South University Drive, Suite No. 4

Fargo, North Dakota 58103

Telephone: (701) 281-8822 Facsimile: (701) 237-0544 e-mail: Michael@neustel.com July 12, 2004

Date